

To clarify, the article will NOT report that Mr. Firtash KNEW that Group DF had paid for some of Mr. Giuliani's expenses [REDACTED]. Instead, it will report that Group DF paid for some of Mr. Giuliani's expenses, and that Mr. Firtash (through you) said that he was unaware that his company paid for those expenses. Additionally, it will say that the Group DF administrative assistants who handled the payments did not review Mr. Parnas's invoices but trusted that they were justified.

To the extent that you are asking us to a) include your statement that Mr. Firtash was unaware of Group DF's payments right after the article first mentions his name AND b) repeat that denial later in the story, we will raise those requests with our editor and come back to you. If you have another specific factual concern -- or if you want to state on the record that Group DF administrative assistants didn't notice the Giuliani expenses because some of those expenses were referenced in broader expense reports issued by Mr. Parnas' travel agent -- please let us know.

First list of 22 assertions to confirm or modify:

(1) In the summer of 2019, Rudy Giuliani was working as Donald J. Trump's lawyer in a pro bono capacity and was running into some financial difficulties. Around that time, Group DF provided some help to Mr. Giuliani by paying tens of thousands of dollars for Mr. Giuliani's travels [REDACTED]. This included paying for Mr. Giuliani's stay at the Ritz London hotel in late June 2019 and his flight on a private jet in mid July 2019 from Santo Domingo to Washington, DC [REDACTED].

(2) Mr. Giuliani is the focus of an investigation by the U.S. attorney's office in Manhattan (SDNY). The travel payments mentioned above are not central to this investigation. That said, early in the investigation, SDNY issued a subpoena that named Mr. Firtash. SDNY also interviewed witnesses about Mr. Giuliani's travel.

(3) Mr. Firtash (through Mr. Davis) denied knowing about the payments for Mr. Giuliani's travel, and said that his associates had arranged the payments [REDACTED] without his permission [REDACTED]. Specifically, Mr. Davis said that administrative assistants at Mr. Firtash's company had arranged payment for Lev Parnas's expenses, [REDACTED] Mr. Giuliani's travel. And although the assistants did not review the details of these expenses, they trusted that they were justified.

(4) Mr. Firtash has announced his opposition to the Russian invasion of Ukraine and sought to return to Ukraine.

(5) Mr. Firtash currently resides in Vienna, where he has been living while fighting extradition to the U.S. on bribery-related charges. In the U.S. indictment, which was filed in 2013, Mr. Firtash is accused of a conspiracy to bribe Indian officials for permission to mine titanium.

(6) Mr. Firtash made billions in the energy market with Russia's blessing [REDACTED]
[REDACTED]
[REDACTED]

(7) Before traveling on Group DF's dime, Mr. Giuliani had criticized Mr. Firtash for purported dealings with a Russian mob boss. Mr. Giuliani made this accusation in a TV interview in March 2019 as part of an attack on Mr. Davis. Mr. Firtash has denied any associations with organized crime.

(8) In May 2019, Mr. Giuliani and Mr. Parnas met in Paris with Dmitry Toerner. Mr. Toerner is one of Mr. Firtash's executives. This meeting was unrelated to Mr. Giuliani's effort to dig up dirt on the Biden family. This meeting did, however, allow Mr. Parnas to enter Mr. Firtash's orbit.

(9) In June 2019, Mr. Toerner helped introduce Mr. Parnas to Mr. Firtash.

(10) In a series of meetings with Mr. Firtash in Vienna in June and July 2019, Mr. Parnas recommended that he add new lawyers to his team, specifically, Victoria Toensing and Joseph DiGenova. Mr. Parnas claimed that Ms. Toensing and Mr. DiGenova could secure a meeting with Attorney General Barr. They did secure the meeting, but Mr. Firtash's case remains pending. Ms. Toensing and Mr. DiGenova no longer represent Mr. Firtash.

(11) As part of his deal with Ms. Toensing and Mr. DiGenova, Mr. Firtash paid Mr. Parnas \$200,000 to serve as an interpreter for the two lawyers. Mr. Firtash also agreed to pay for some of Mr. Parnas's [REDACTED] travel.

(12) In the past, Mr. Firtash had been [publicly critical](#) of Mr. Biden. As such, by June 2019, Mr. Firtash was seen by some as a potential ally for Mr. Giuliani. [REDACTED]
[REDACTED]
[REDACTED]

(13) There is no indication that Mr. Firtash tried to give Mr. Giuliani dirt on the Bidens or Burisma.

(14) Mr. Giuliani did, however, try to get Mr. Firtash's help. And representatives of both Mr. Firtash and Mr. Giuliani did explore whether each man might be able to assist the other.

A. In June 2019, Mr. Giuliani called [Firtash Attorney] [REDACTED] and asked whether Mr. Firtash had information about corruption in Ukraine. [Firtash Attorney] [REDACTED] declined to help.

A. Later that month, Mr. Giuliani called another one of Mr. Firtash's lawyers, this one in Vienna. Mr. Giuliani sought a meeting with this lawyer, [Firtash attorney] [REDACTED] [REDACTED] to discuss their potential mutual interests, according to Mr. Davis. [REDACTED]
[REDACTED]

(15) In late June 2019, Mr. Firtash authorized his team to meet with Mr. Giuliani about his extradition case. As such, Mr. Giuliani met in London with two Firtash associates. One was Otto Dietrich, another lawyer for Mr. Firtash, and the other was [REDACTED] [REDACTED], a banker whose family had ties to Burisma. During the meeting, Mr. Giuliani mentioned his interest in Burisma, according to Mr. Davis, who also said that no one had responded to Mr. Giuliani's comment about Burisma. Mr. Davis said that the purpose of the meeting was to discuss Mr. Firtash's contention that his extradition case was politically motivated and that they did not seek Mr. Giuliani's help.

(16) The same day of that meeting, Mr. Giuliani changed hotels to the Ritz London. Group DF paid for the roughly \$8,000 stay. [REDACTED]

(17) Group DF also paid \$36,000 for a private jet flight Mr. Giuliani took on July 18, 2019, from the Dominican Republic to Washington. [REDACTED]
[REDACTED]

(18) In early August 2019, Mr. Giuliani traveled with a female companion and a bodyguard to Spain, costing more than \$30,000. [REDACTED]
[REDACTED]
[REDACTED]

(19) In September 2019, Mr. Giuliani, Mr. Parnas and other associates took a private jet from Washington to New Jersey that cost about \$9,000. [REDACTED]

(20) The travel agent who booked the trip to Spain and the trip from DC to NJ listed them on invoices to Mr. Firtash's assistant, [REDACTED], and Ralph Isenegger, a longtime adviser to Mr. Firtash. Mr. Isenegger wired the travel agent tens of thousands of dollars after these trips. [REDACTED]
[REDACTED]
[REDACTED]

(21) Mr. Isenegger says that he has always been reimbursed by Group DF for any payment he made on behalf of the company [REDACTED]
[REDACTED], though Mr. Davis said that Mr. Firtash had nothing to do with Mr. Isenegger's wire transfer and was not aware of any reimbursement to Mr. Isenegger.

(22) According to Mr. Davis, Mr. Firtash did not know how a document from his extradition case containing information about the Bidens (the Shokin affidavit) had ended up in Mr. Giuliani's custody. Mr. Davis said that Mr. Firtash was furious that the

affidavit was leaked to Mr. Giuliani. Mr. Davis said he was not authorized to identify the source of the leak.

*DISSEMINATED BY DAVIS, GOLDBERG & GALPER PLLC, A REGISTERED
FOREIGN AGENT, ON BEHALF OF DMITRY FIRTASH. MORE INFORMATION IS ON
FILE WITH THE DEPT OF JUSTICE, WASHINGTON DC.*